

Ms. Annabelle Dillard  
Manager, Policy Standards and Quality Assurance Unit  
Asbestos Program  
Texas Department of State Health Services  
P.O. Box 149347  
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RE: NESHAP Applicability for Demolition of Buildings in West, Texas

On April 17, 2013, an explosion at the West Fertilizer Company in West, Texas caused massive damage to area buildings including numerous private family residences, apartment complexes, an elder care home, and several schools. The National Emission Standard for Hazardous Air Pollutants (NESHAP) for asbestos applies differentially to demolitions of these structures as described in EPA's Guidelines for Catastrophic Emergency Situations Involving Asbestos (Guidance), December 2009.

Debris on the ground or in right-of-ways – The NESHAP does not apply to debris on the ground since this material is no longer a structure under the NESHAP (See page 28 of the Guidance). Workers should work to handle this material in a wet fashion and strive for no visible emissions to help protect workers and residents from potential asbestos fibers in this material.

Single Family Residential Structures under the Control of the Homeowner – The Asbestos NESHAP does not apply to individual single family homes being renovated or demolished by the homeowner (See page 30 of the Guidance). Homeowners are encouraged to perform these demolitions under wet conditions with no visible emissions and to transport the debris to an appropriate landfill for this type of waste. Notification to the landfill is encouraged in order to protect waste site workers.

Single Family Residential Structures under the Control of Local, City, State or Federal Government – In the event that a government agency will be performing demolitions (or their contractors), the demolition of single family homes is covered by the NESHAP. (See page 31 of the Guidance)

Apartments, Schools, ElderCare Facility – The Asbestos NESHAP applies to demolitions of these structures. (See page 29 of the Guidance)

In the event that Texas State Law is different than described above, please let me and our emergency response personnel know as soon as possible since demolitions will be underway beginning this week.

If I can be of assistance or answer any questions, please contact me at 214 665-2769.

Sincerely,

Steve Thompson  
Acting Associate Director  
Air Enforcement Branch  
Compliance Assurance and Enforcement Division  
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